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Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JONATHAN G. MORTON,

Plaintiff,

- against -

CITIBANK, N.A.,

Defendant.

Case No.: 18-CV-9048 (JPO)

REPLY DECLARATION OF
BRUCE S. GOODMAN

STATE OF NEW YORK,
COUNTY OF NEW YORK.

Bruce S. Goodman, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am an attorney and Of Counsel to Zeichner Ellman & Krause LLP, attorneys for defendant Citibank, N.A., and a member of this Court. I make this reply declaration in opposition to plaintiff Jonathan G. Morton's motion to remand this action to the Supreme Court of the State of New York, and in support of Citibank's cross-motion to pursuant to Fed. R. Civ. P. 12(b)(6) for an order dismissing the complaint.

2. Attached as **Exhibit A** is a copy of a page from the website of the Immigration Bureau of Japan setting forth the details of a “Highly Skilled Foreign Professional” 5-year visa.¹

3. Attached as **Exhibit B** is a copy of the “Contact Us” page from the website for Fashion One LLC, and copies of registrations for Fashion One Broadcasting LLC and Fashion One Television LLC with the New York Department of State.

4. Attached as **Exhibit C** is a copy of the registration for CKL Brands LLC with the New York Department of State.

5. Attached as **Exhibit D** is a copy of the registration for Law Offices of Morton & Associates LLLP with the Florida Department of State.

6. Attached as **Exhibit E** is a copy of the registration for Law Offices of Morton & Associates LLLP with the New York Department of State.

7. Attached as **Exhibit F** is a copy of the registration for Morton & Associates LLP with the New York Department of State.

¹ http://www.immi-moj.go.jp/newimmiact_3/en/system/index.html.

8. Attached as **Exhibit G** is a copy of the Certificate of Limited Partnership for Law Offices of Morton & Associates LLLP that Plaintiff filed with the Florida Department of State on May 12, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 5, 2019



BRUCE S. GOODMAN